

Dear Ms. Duff,

I represent Parrsboro Metal Fabricators Ltd., also known by the trade name Kerr Heating Products (Kerr). Kerr is a manufacturer of oil-fired warm air furnaces and boilers based in Nova Scotia, Canada. Kerr sells its products to a number of customers in the United States, particularly in New England and the Mid-Atlantic states.

I received a copy of the EPA proposed changes to Energy Star this week. I would like to state I support the EPA proposal for an Energy Star level of 83% AFUE for oil-fired warm air furnaces. However, I would like to reserve comment on the proposed Eae requirement until I have had an opportunity to review the potential impact on Kerr's product line and what steps Kerr might take, if any, to ensure Kerr has a number of models that would meet the 800 kWh/year requirement. I believe the 800 kWh/year level may be somewhat problematic to achieve for higher output furnaces used in applications where five tons of air conditioning is required.

Regards,

Steven Wilson
President
Kerr Heating Products